

April 18, 2002

Mr. Raymond Roembke Jr.  
Reclaimed Energy Company, Inc.  
1500 Western Avenue  
Connersville, Indiana 47331

Re: 041-15793  
Third Administrative Amendment to  
Part 70 T041-6719-00015

Dear Mr. Roembke:

Reclaimed Energy Company, Inc., located at 1500 Western Avenue, Connersville, Indiana 47331 was issued a Part 70 permit on June 1, 2001 for a chemical recycling operations. A letter requesting a change in the permit was received on March 28, 2002. The change qualifies as administrative amendment under 326 IAC 2-7-11, to correct typographical error in different sections of the permit. Pursuant to this rule the permit is hereby administratively amended as follows (changes are **bolded** and deletions are ~~struck through~~ for emphasis):

Request 1: Section 6.1, page 44. The revised page from the second administrative amendment does not contain the text of D.6.1 and D.6.2, as did the previous page 44.

Response 1: Section D.6.1 on page 44, will be revised to include the following conditions as reflected in the original page of the Part 70.

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

**D.6.1 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR Part 63, Subpart A]**

**The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR Part 63, Subpart DD, Table 2.**

**D.6.2 Off-site Waste and Recovery Operations NESHAP [326 IAC 20-23-1] [40 CFR Part 63, Subpart DD]**

**These facilities are subject to 40 CFR Part 63, Subpart DD, which is incorporated by reference as 326 IAC 20-23-1, with a compliance date of February 1, 2000. A copy of this rule is attached.**

Request 2: Condition D.1.7(b), page 33, should read "To document compliance with Condition D.1.6".

Response 2: Condition D.1.7(b) is correct as written in the permit. This condition as written requires that to comply with the required operating temperature in Condition D.1.4, the source shall do monitoring and daily recording of the catalytic exhaust temperature as required Condition D.1.6. No changes will be made to this condition.

Request 3: Condition D.3.3(a), page 37. The text should read "at all times that any of the facilities listed in D.3.2 are operating".

Response 3: Condition D.3.3(a) will be changed as requested, although using either “being utilized” as written in the permit or “operating” as suggested will not change the intent of the condition.

#### D.3.3 Catalytic Thermal Oxidizer Operation

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- (a) The catalytic thermal oxidizer shall operate at all times that any of the facilities listed in Condition D.3.2 are ~~being utilized~~ **operating**. When utilized, the catalytic thermal oxidizer shall maintain a minimum operating temperature of 650E Fahrenheit or a temperature, fan amperage and duct velocity determined in a stack test to maintain a minimum 90 percent destruction of the volatile organic compound (VOC) captured.

Request 4: Condition D.6.2, page 44. The NESHAP compliance date listed should be February 1, 2001 instead of February 1, 2000.

Response 4: February 1, 2000 is correct as the compliance date for the source, since the source was existing before October 13, 1994 and receives off-site material for the first time before February 1, 2000. Therefore, Condition D. 6.2 will remain the same.

Request 5: Condition D. 6.6(c)(3), page 51. The reference should be D.6.15(a), not D.6.14(a).

Response 5: The typographical error on Condition D.6.6(c)(3), will be changed as requested:

#### D.6.6 Standards: Closed Vent Systems and Control Devices [326 IAC 20-23-1] [40 CFR 63.693]

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- (a) No change  
(b) No change  
(c) Pursuant to 40 CFR 63.693(f), the catalytic thermal oxidizer must achieve the following performance specifications:
- (1) Pursuant to 40 CFR 63.693(f)(1)(i)(A), destroy the total organic compounds (TOC), less methane and ethane, contained in the vent stream entering the catalytic thermal oxidizer by 95 percent or more, on a weight-basis.
  - (2) Pursuant to 40 CFR 63.693(f)(2), the Permittee must use a design analysis of the catalytic thermal oxidizer to demonstrate compliance with paragraph (1) of this condition. The Permittee must include, as part of the design analysis, the information specified in 40 CFR 63.693(f)(2)(ii)(B) and Condition D.6.10(a).
  - (3) Pursuant to 40 CFR 63.693(f)(3), the Permittee must monitor the operation of the catalytic thermal oxidizer in accordance with 40 CFR 63.695(e) and Condition D.6.14-15(a).
- (d) No change

Request 6: Condition D.6.7 referenced the wrong Conditions in sections (b), (c)(2)(A), (c)(2)(B), (f), (g), and (i)(2).

Response 6: Condition D.6.7(b) will be amended to reference the correct Conditions as follows:

#### D.6.7 National Emission Standard for Equipment Leaks (Fugitive Emission Sources)[40 CFR 61, Subpart V]

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- (a) No change

- (b) Pursuant to 40 CFR 61.242-2 (Standards: Pumps), each pump shall be monitored in accordance with Condition D.6.45 **16(a)**.
- (c) Pursuant to 40 CFR 61.242-4 (Standards: Pressure relief devices in gas/vapor service), the standards listed below apply to pressure relief devices in gas/vapor service.
  - (1) Except during pressure releases, each pressure relief device in gas/vapor service shall be operated with no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, as measured by the method specified in 40 CFR 61.245(c).
  - (2) The following requirements apply regarding pressure releases:
    - (A) After each pressure release, the pressure relief device shall be returned to a condition of no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, as soon as practicable, but no later than 5 calendar days after each pressure release, except as provided in 40 CFR 61.242-10 and Condition D.6.45 **16(e)**; and,
    - (B) No later than 5 calendar days after the pressure release, the pressure relief device shall be monitored in accordance with Condition D.6.45 **16(b)**.
  - (3) Any pressure relief device that is equipped with a closed-vent system capable of capturing and transporting leakage from the pressure relief device to a control device as described in 40 CFR 61.242-11 and paragraph (i) of this condition is exempt from the requirements of paragraphs (c)(1) and (2) of this condition. The four check valves designed to relieve pressure on the following units meet the requirements of this paragraph: EU-VD 1/EU-TK 22, EU-Col 1/EU-TK 18, EU-Col 2/EU-TK 19, and EU-DP 1/EU-TK 20.
- (d) No change
- (e) No change
- (f) Pursuant to 40 CFR 61.242-7 (Standards: Valves), each valve shall be monitored in accordance with Condition D.6.45 **16(c)**.
- (g) Pursuant to 40 CFR 61.242-8 (Standards: Pressure relief devices in liquid service and flanges and other connectors), pressure relief devices in liquid service and flanges and other connectors shall be monitored in accordance with Condition D.6.45 **16(d)**.
- (h) No change
- (i) Pursuant to 40 CFR 61.242-11 (Standards: Closed-vent systems and control devices), the Permittee shall comply with the provisions of this paragraph for the closed-vent system and catalytic thermal oxidizer .
  - (1) The catalytic thermal oxidizer shall be designed and operated to reduce the VHAP emissions vented to it with an efficiency of 95 percent or greater.

- (2) The Permittee shall monitor the catalytic thermal oxidizer and closed-vent system in accordance with the provisions in Condition D.6.15 and **D.6.16(f)** ~~(f) and (g)~~.
- (3) Closed-vent systems shall be designed for and operated with no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background and by visual inspections, as determined by the methods specified in 40 CFR 61.245(c).
- (4) The closed-vent system and catalytic thermal oxidizer shall be operated at all times when emissions may be vented to them.

Request 7: Condition D.6.15(c) states “paragraph (b)(4) of this condition” but this reference does not exist. It is unclear what reference is correct. Please either remove or replace with the correct reference.

Response 7: 40 CFR 63.695(c)(3) referenced in Condition D.6.15(c) will stay, since it is a correct citation, however, the statement “and of paragraph (b)(4) of this condition” will be deleted since it does not exist.

**D.6.15 Monitoring Procedures for Catalytic Thermal Oxidizer and Closed-Vent System [326 IAC 2-7-6(1)] [40 CFR 63, Subpart DD]**

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- (a) No change
- (b) No change
- (c) In the event that a defect is detected, the Permittee shall repair the defect in accordance with the requirements of 40 CFR 63.695(c)(3) ~~and of paragraph (b)(4) of this condition.~~
- (d) No change

Request 8: Condition D.6.15(c)(2)(A) referenced in Condition D.6.20(c) is incorrect because it does not exist. Please remove or replace with the correct reference.

Response 8: Condition D.6.15(c)(2)(A) will be deleted in Condition D.6.20(c), since it does not exist. Amendment is as follows:

**D.6.20 Record Keeping Requirements for Catalytic Thermal Oxidizer and Closed-Vent System [40 CFR 63, Subpart DD]**

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- (a) No change
- (b) No change
- (c) Pursuant to 40 CFR 63.693(c)(2)(i) ~~and Condition D.6.15(c)(2)(A)~~, the Permittee shall maintain records of the following information: hourly records of whether the flow indicator was operating and whether flow was detected at any time during the hour; and records of all periods when flow is detected or the flow indicator is not operating.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Aida De Guzman, at (800) 451-6027, press 0 and ask for Aida De Guzman or extension (3-4972), or dial (317) 233-4972.

Sincerely,

Original Signed by Paul Dubenetzky  
Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

Attachments

APD

cc: File - Fayette County  
U.S. EPA, Region V  
Fayette County Health Department  
Air Compliance Section Inspector - Warren Greiling  
Compliance Data Section - Karen Nowak  
Administrative and Development - Janet Mobley  
Technical Support and Modeling - Michele Boner

# **PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY**

**Reclaimed Energy Company, Inc.  
1500 Western Avenue  
Connersville, Indiana 47331**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 041-6719-00015	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: June 1, 2001  Expiration Date: June 1, 2006
1 <sup>st</sup> Administrative Amendment No.: 041-14644, issued on August 22, 2001 2 <sup>nd</sup> Administrative Amendment No.: 041-14835, issued on October 3, 2001	
3 <sup>rd</sup> Administrative Amendment No.: 041-15793	Pages Affected: 37, 44, 51, 52, 53, 62, 67
Issued by: Original Signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Permit Branch Office of Air Quality	Issuance Date: April 18, 2002

**Facility Description [326 IAC 2-7-5(15)] continued**

- (ww) Small pilot solvent recycling unit, known as EU-SP, catalytic thermal oxidizer, with batch capacity: 165 gallons.
- (xx) One (1) solid dispersion unit, known as EU-SD 1, consisting of one (1) 250 gallon tub and one (1) dispenser, exhausted through Stacks SD 1 and FI 1, vented to a catalytic thermal oxidizer, throughput capacity: 19,200 gallons per day.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

**D.3.1 NESHAP [326 IAC 20-23-1] [40 CFR Part 63]**

EU-TK 30, EU-TK 31, EU-TK 32, EU-TK 33, EU-TK 34, EU-TK 35, EU-TK 36, EU-TK 37, EU-TK 38, EU-TK 39, EU-TK 41, EU-TK 42, EU-TK 50, EU-TK 51, EU-TK 52, EU-TK 53, EU-V 61 and EU-SD 1 are subject to 40 CFR Part 63 as specified in Section D.6.

**D.3.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]**

Pursuant to 326 IAC 8-1-6 (New facilities; general reduction requirements):

- (a) the as-installed catalytic thermal oxidizer is the Best Available Control Technology and shall be operated at all times when EU-TK39, EU-TK40, EU-TK41, EU-TK51, EU-TK52, EU-TK53, EU-V61 and EU-SP are being utilizing in the recycling process:
- (b) the volatile organic compound (VOC) emissions shall not exceed 58.9 tons per twelve (12) consecutive month period for all facilities equipped with the catalytic thermal oxidizer.

VOC emissions = Input VOC \*(1- overall control efficiency of the thermal oxidizer) + 3(uncontrolled VOC input \* emission factor).

**D.3.3 Catalytic Thermal Oxidizer Operation**

- (a) The catalytic thermal oxidizer shall operate at all times that any of the facilities listed in Condition D.3.2 are operating. When utilized, the catalytic thermal oxidizer shall maintain a minimum operating temperature of 650E Fahrenheit or a temperature, fan amperage and duct velocity determined in a stack test to maintain a minimum 90 percent destruction of the volatile organic compound (VOC) captured.
- (b) When operating the thermal oxidizer, the thermal oxidizer shall maintain a minimum ninety-five (95) percent capture efficiency and ninety-five (95) percent destruction efficiency. These efficiencies and the use of the thermal oxidizer are required by rule 326 IAC 8-1-2(a)(2).

**D.3.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

**D.3.5 Monitoring**

- (a) Daily records of the catalytic thermal oxidizer exhaust temperature shall be observed on each day that any of the facilities listed in Condition D.3.2 operated. The Compliance Response Plan shall be followed whenever a condition exists which should result in a

**Facility Description [326 IAC 2-7-5(15)] (continued)**

- (jj) One (1) product storage tank, known as EU-TK 35, installed in 1984, capacity: 4,700 gallons of spent volatile organic compound waste.
- (kk) One (1) product storage tank, known as EU-TK 36, installed in 1984, capacity: 4,700 gallons of spent volatile organic compound waste.
- (ll) One (1) product storage tank, known as EU-TK 37, installed in 1984, capacity: 4,700 gallons of spent volatile organic compound waste.
- (mm) One (1) product storage tank, known as EU-TK 38, installed in 1983, capacity: 10,000 gallons of spent volatile organic compound waste.
- (nn) One (1) product storage tank, known as EU-TK 39, installed in 1983, vented to a catalytic thermal oxidizer, capacity: 12,000 gallons of spent volatile organic compound waste and still bottoms.
- (oo) One (1) product storage tank, known as EU-TK 40, installed in 1984, vented to a catalytic thermal oxidizer, capacity: 3,300 gallons of spent volatile organic compound waste and still bottoms.
- (pp) One (1) product storage tank, known as EU-TK 41, installed in 1984, vented to a catalytic thermal oxidizer, capacity: 3,300 gallons of spent volatile organic compound waste and still bottoms.
- (qq) One (1) product storage tank, known as EU-TK 42, installed in 1984, capacity: 5,100 gallons of process water.
- (rr) One (1) product storage tank, known as EU-TK 50, installed in 1992, capacity: 6,900 gallons of waste volatile organic compounds.
- (ss) One (1) product storage tank, known as EU-TK 51, installed in 1995, vented to a catalytic thermal oxidizer, capacity: 6,800 gallons of volatile organic compounds and distillation heels.
- (tt) One (1) product storage tank, known as EU-TK 52, installed in 1995, vented to a catalytic thermal oxidizer, capacity: 6,900 gallons of volatile organic compounds.
- (uu) One (1) product storage tank, known as EU-TK 53, installed in 1995, vented to a catalytic thermal oxidizer, capacity: 6,900 gallons of volatile organic compounds.
- (vv) One (1) over pressurization temporary accumulation vessel, known as EU-V 61, attached to the catalytic thermal oxidizer, installed in 1997, capacity: 165 gallons.
- (xx) One (1) solid dispersion unit, known as EU-SD 1, consisting of one (1) 250 gallon tub and one (1) dispenser, exhausted through Stacks SD 1 and FI 1, vented to a catalytic thermal oxidizer, throughput capacity: 19,200 gallons per day.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

**D.6.1 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR Part 63, Subpart A]**

The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR Part 63, Subpart DD, Table 2.

**D.6.2 Off-site Waste and Recovery Operations NESHAP [326 IAC 20-23-1] [40 CFR Part 63, Subpart DD]**

These facilities are subject to 40 CFR Part 63, Subpart DD, which is incorporated by reference as 326 IAC 20-23-1, with a compliance date of February 1, 2000. A copy of this rule is attached.



- (3) Whenever gases or vapors containing HAP are vented through the closed-vent system connected to the catalytic thermal oxidizer, the catalytic thermal oxidizer shall be operating except at the times listed in either paragraph (a)(3)(A) or (a)(3)(B) of this condition.
  - (A) The catalytic thermal oxidizer may be bypassed for the purpose of performing planned routine maintenance of the closed-vent system or catalytic thermal oxidizer in situations when the routine maintenance cannot be performed during periods that the emission point vented to the catalytic thermal oxidizer is shutdown. On an annual basis, the total time that the closed-vent system or catalytic thermal oxidizer is bypassed to perform routine maintenance shall not exceed 240 hours per each calendar year.
  - (B) The catalytic thermal oxidizer may be bypassed for the purpose of correcting a malfunction of the closed-vent system or catalytic thermal oxidizer. The Permittee shall perform the adjustments or repairs necessary to correct the malfunction as soon as practicable after the malfunction is detected.
- (b) Pursuant to 40 CFR 63.693(c), the vent stream required to be controlled by Conditions D.6.2, D.6.4, and D.6.5 shall be conveyed to the catalytic thermal oxidizer by a closed-vent system that is designed to operate at a pressure below atmospheric pressure.
- (c) Pursuant to 40 CFR 63.693(f), the catalytic thermal oxidizer must achieve the following performance specifications:
  - (1) Pursuant to 40 CFR 63.693(f)(1)(i)(A), destroy the total organic compounds (TOC), less methane and ethane, contained in the vent stream entering the catalytic thermal oxidizer by 95 percent or more, on a weight-basis.
  - (2) Pursuant to 40 CFR 63.693(f)(2), the Permittee must use a design analysis of the catalytic thermal oxidizer to demonstrate compliance with paragraph (1) of this condition. The Permittee must include, as part of the design analysis, the information specified in 40 CFR 63.693(f)(2)(ii)(B) and Condition D.6.10(a).
  - (3) Pursuant to 40 CFR 63.693(f)(3), the Permittee must monitor the operation of the catalytic thermal oxidizer in accordance with 40 CFR 63.695(e) and Condition D.6.15(a).
- (d) The catalytic thermal oxidizer shall maintain the minimum catalyst bed inlet operating temperature and a minimum catalyst bed outlet operating temperature of 650 degrees Fahrenheit (EF) until the minimum catalyst bed inlet and outlet temperatures necessary to maintain a minimum 95% by weight overall destruction of the TOC, less methane and ethane, is determined by the design analysis conducted in accordance with Condition D.6.10. The Permittee shall apply for a minor permit modification to include the minimum catalyst bed inlet and outlet operating temperature values, as determined by the design analysis, upon approval of the design analysis by IDEM, OAQ.

D.6.7 National Emission Standard for Equipment Leaks (Fugitive Emission Sources)[40 CFR 61, Subpart V]  
Pursuant to 40 CFR 63.683(d) and 40 CFR 63.691(b)(1), the Permittee shall control the HAP emitted from equipment leaks in accordance with 40 CFR 61, Subpart V - National Emission Standard for Equipment Leaks (Fugitive Emission Sources), Sections 61.242 through 61.247. The provisions apply to each equipment component that is part of the affected source, including components

related to EU-VD 1/EU-TK 22, EU-Col 1/EU-TK 18, EU-Col 2/EU-TK 19, EU-VP 1, EU-DP 1/EU-TK 20, EU-TF 1, EU-TF 2, FI 1, EU-TK 40, EU-TK 41, EU-V 61 EU-TK 30, EU-TK 31, EU-TK 32, EU-TK 33, EU-TK 34, EU-TK 35, EU-TK 36, EU-TK 37, EU-TK 38, EU-TK 39, EU-TK 42, EU-TK 50, EU-TK 51, EU-TK 52, EU-TK 53, and EU-SD 1, that meet the criteria specified in 40 CFR 63.680(c)(3).

- (a) Pursuant to 40 CFR 61.242-1(d), each piece of equipment to which this subpart applies shall be marked in such a manner that it can be distinguished readily from other pieces of equipment.
- (b) Pursuant to 40 CFR 61.242-2 (Standards: Pumps), each pump shall be monitored in accordance with Condition D.6.16(a).
- (c) Pursuant to 40 CFR 61.242-4 (Standards: Pressure relief devices in gas/vapor service), the standards listed below apply to pressure relief devices in gas/vapor service.
  - (1) Except during pressure releases, each pressure relief device in gas/vapor service shall be operated with no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, as measured by the method specified in 40 CFR 61.245(c).
  - (2) The following requirements apply regarding pressure releases:
    - (A) After each pressure release, the pressure relief device shall be returned to a condition of no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, as soon as practicable, but no later than 5 calendar days after each pressure release, except as provided in 40 CFR 61.242-10 and Condition D.6.16(e); and,
    - (B) No later than 5 calendar days after the pressure release, the pressure relief device shall be monitored in accordance with Condition D.6.16(b).
  - (3) Any pressure relief device that is equipped with a closed-vent system capable of capturing and transporting leakage from the pressure relief device to a control device as described in 40 CFR 61.242-11 and paragraph (i) of this condition is exempt from the requirements of paragraphs (c)(1) and (2) of this condition. The four check valves designed to relieve pressure on the following units meet the requirements of this paragraph: EU-VD 1/EU-TK 22, EU-Col 1/EU-TK 18, EU-Col 2/EU-TK 19, and EU-DP 1/EU-TK 20.
- (d) Pursuant to 40 CFR 61.242-5 (Standards: Sampling connecting systems), the standards listed below apply to sampling connecting systems.
  - (1) Each sampling connection system shall be equipped with a closed-purge system or closed vent system.
  - (2) Each closed-purge system or closed-vent system as required in paragraph (d)(1) shall:
    - (A) For the sampling systems for the units EU-VD 1, EU-TK 22, EU-Col 1/EU-TK 18, EU-Col 2/EU-TK 19, and EU-DP 1/EU-TK 20, return the purged process fluid directly to the process line with zero volatile hazardous air pollutant (VHAP) emissions to the atmosphere; or,

- (B) For the sampling systems for units EU-TF 1 and EU-TK 2, be designed and operated to capture and transport all the purged process fluid to the closed vent system and catalytic thermal oxidizer, FI 1.
- (e) Pursuant to 40 CFR 61.242-6 (Standards: Open-ended valves or lines), the standards listed below apply to open-ended valves or lines.
- (1) Each open-ended valve or line shall be equipped with a cap, blind flange, plug, or a second valve, except as provided in paragraph (e)(4) of this condition.
  - (2) The cap, blind flange, plug, or second valve shall seal the open end at all times except during operations requiring process fluid flow through the open-ended valve or line.
  - (3) Each open-ended valve or line equipped with a second valve shall be operated in a manner such that the valve on the process fluid end is closed before the second valve is closed.
  - (4) When a double block and bleed system is being used, the bleed valve or line may remain open during operations that require venting the line between the block valves but shall comply with paragraph (e)(1) of this condition at all other times.
- (f) Pursuant to 40 CFR 61.242-7 (Standards: Valves), each valve shall be monitored in accordance with Condition D.6.16(c).
- (g) Pursuant to 40 CFR 61.242-8 (Standards: Pressure relief devices in liquid service and flanges and other connectors), pressure relief devices in liquid service and flanges and other connectors shall be monitored in accordance with Condition D.6.16(d).
- (h) Pursuant to 40 CFR 61.242-9 (Standards: Product accumulator vessels), each product accumulator vessel shall be equipped with a closed-vent system capable of capturing and transporting any leakage from the vessel to the catalytic thermal oxidizer, FI 1.
- (i) Pursuant to 40 CFR 61.242-11 (Standards: Closed-vent systems and control devices), the Permittee shall comply with the provisions of this paragraph for the closed-vent system and catalytic thermal oxidizer.
- (1) The catalytic thermal oxidizer shall be designed and operated to reduce the VHAP emissions vented to it with an efficiency of 95 percent or greater.
  - (2) The Permittee shall monitor the catalytic thermal oxidizer and closed-vent system in accordance with the provisions in Condition D.6.15 and D.6.16(f).
  - (3) Closed-vent systems shall be designed for and operated with no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background and by visual inspections, as determined by the methods specified in 40 CFR 61.245(c).
  - (4) The closed-vent system and catalytic thermal oxidizer shall be operated at all times when emissions may be vented to them.

- (c) In the event that a defect is detected, the Permittee shall repair the defect in accordance with the requirements of 40 CFR 63.695(c)(3).
- (d) The Permittee shall repair all detected defects as follows:
  - (1) The Permittee shall make first efforts at repair of a defect no later than 5 calendar days after detection and repair shall be completed as soon as possible but no later than 45 calendar days after detection.
  - (2) Repair of a defect may be delayed beyond 45 calendar days if either of the conditions specified below occurs. In this case, the Permittee must repair the defect the next time the process or unit that vents to the closed-vent system is shutdown. Repair of the defect must be completed before the process or unit resumes operation.
    - (A) Completion of the repair is technically infeasible without the shutdown of the process or unit that vents to the closed-vent system.
    - (B) The Permittee determines that the air emissions resulting from the repair of the defect within the specified period would be greater than the fugitive emissions likely to result by delaying the repair until the next time the process or unit that vents to the closed-vent system is shutdown.

**D.6.16 Monitoring Procedures for Equipment Leaks [326 IAC 2-7-6(1)] [40 CFR 61, Subpart V][40 CFR 63, Subpart DD]**

Pursuant to 40 CFR 61, Subpart V, the Permittee must conduct monitoring in accordance with the paragraphs listed below to comply with leak detection requirements.

- (a) Pursuant to 40 CFR 61.242-2, the following standards apply to pumps:
  - (1) Each pump shall be monitored monthly to detect leaks by the methods specified in 40 CFR 61.245(b).
  - (2) Each pump shall be checked by visual inspection each calendar week for indications of liquids dripping from the pump seal.
  - (3) If an instrument reading of 10,000 ppm or greater is measured, a leak is detected.
  - (4) If there are indications of liquids dripping from the pump seal, a leak is detected.
  - (5) When a leak is detected, it shall be repaired as soon as practicable, but not later than 15 calendar days after each leak is detected, except as provided in 40 CFR 61.242-10 and paragraph (e) of this condition.
  - (6) A first attempt at repair shall be made no later than 5 calendar days after each leak is detected.
- (b) Pursuant to 40 CFR 61.242-4(b)(2), no later than 5 calendar days after a pressure release, the pressure relief device in gas/vapor service shall be monitored to confirm the condition of no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, as measured by the method specified in 40 CFR 61.245(c).

- (2) Pursuant to 40 CFR 63.696(h), the Permittee shall record the following information for those unexpected control device system malfunctions that would require the catalytic thermal oxidizer not to meet the requirements of 40 CFR 63.693(f), as applicable:
  - (A) The occurrence and duration of each malfunction of the control device system;
  - (B) The duration of each period during a malfunction when gases, vapors, or fumes are vented from the waste management unit through the closed-vent system to the catalytic thermal oxidizer while the catalytic thermal oxidizer is not properly functioning; and,
  - (C) Actions taken during periods of malfunction to restore a malfunctioning control device to its normal or usual manner of operation.
- (3) Pursuant to 40 CFR 63.695(c)(2)(iv), the Permittee shall maintain a record of inspections performed in accordance with 40 CFR 63.695(c).
- (4) Pursuant to 40 CFR 63.695(c)(3)(iii), the Permittee shall maintain a record of defect repair.
- (c) Pursuant to 40 CFR 63.693(c)(2)(i), the Permittee shall maintain records of the following information: hourly records of whether the flow indicator was operating and whether flow was detected at any time during the hour; and records of all periods when flow is detected or the flow indicator is not operating.

D.6.21 Record Keeping Requirements for Equipment Leaks [40 CFR 63, Subpart DD] [40 CFR 61, Subpart V]  
Pursuant to 40 CFR 61.246, the Permittee shall comply with the record keeping requirements of this paragraph.

- (a) The Permittee may comply with the record keeping requirements for the process units in one record keeping system if the system identifies each record by each process unit.
- (b) When each leak is detected as specified in 40 CFR 61, Sections 242-2, 242-7, and 242-8 and in Condition D.6.16, the following requirements apply:
  - (1) A weatherproof and readily visible identification, marked with the equipment identification number, shall be attached to the leaking equipment.
  - (2) The identification on a valve may be removed after it has been monitored for 2 successive months as specified in 40 CFR 61.242-7(c) and Condition D.6.16 and no leak has been detected during those 2 months.
  - (3) The identification on equipment, except on a valve, may be removed after it has been repaired.
- (c) When each leak is detected as specified in 40 CFR 61, Sections 242-2, 242-7, and 242-8 and in Condition D.6.16, the following information shall be recorded in a log and shall be kept for 2 years in a readily accessible location: